

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY
CO-98-45

In the Matter of)
)
Citizens Telecommunications Company)
Of North Dakota and U S WEST)
Communications, Inc.)
)
Joint Petition for Waivers of the Definition) AAD-
of "Study Area" Contained in Part 36,)
Appendix--Glossary of the Commission's)
Rules)

EXPEDITED JOINT PETITION FOR WAIVERS

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Dan L. Poole

February 15, 2000

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SUMMARY

U S WEST Communications, Inc. ("U S WEST") has agreed to sell eight of its North Dakota exchanges to Citizens Telecommunications Company of North Dakota ("Citizens"). These eight exchanges collectively serve approximately 17,000 access lines. By this Expedited Joint Petition for Waivers ("Petition"), U S WEST seeks a waiver to delete these eight exchanges (including the de minimis number of Minnesota access lines served by two of these North Dakota exchanges) from its North Dakota study area.

Citizens seeks a waiver of the study area definition to establish a new study area consisting of the exchanges it is acquiring from U S WEST. Citizens does not presently provide telephone service within the state of North Dakota.

U S WEST and Citizens respectfully request that the Federal Communications Commission ("Commission") expeditiously review and approve this Petition. This Petition raises no new issues of law, is supported by Commission precedent, and the facts involved in this Petition clearly demonstrate that the public interest will be served by an expeditious grant.

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EXPEDITED JOINT PETITION FOR WAIVERS

I. INTRODUCTION

U S WEST Communications, Inc. ("U S WEST") has agreed to sell eight of its North Dakota exchanges to Citizens Telecommunications Company of North Dakota ("Citizens"). These eight exchanges collectively serve approximately 17,000 access lines. By this Expedited Joint Petition for Waivers ("Petition"), U S WEST seeks a waiver to delete these eight exchanges from its North Dakota study area. Citizens seeks a waiver to establish a new North Dakota study area consisting of the exchanges it is acquiring from U S WEST.

Citizens, a wholly-owned subsidiary of Citizens Utilities Company, is seeking to acquire North Dakota telecommunications property currently owned and operated by U S WEST. Citizens does not presently provide telephone service within the state of North Dakota.

The property being transferred consists of the eight exchanges of Alexander, Fairmount, Gwinner, Lisbon, Pembina, Watford City, Williston and Wyndmere in North Dakota. Also included are approximately 122 access lines served by the Fairmount and Pembina exchanges that are physically located in Minnesota.

The Federal Communications Commission ("Commission") should expeditiously review and approve this Petition. This Petition raises no new issues of law, and the facts involved in this Petition are similar to those involved in similar waiver requests that have been recently approved.¹

II. THE COMMISSION'S STUDY AREA FREEZE SHOULD BE WAIVED

Part 36 of the Commission's Rules "freezes" the definition of "study area" to the boundaries that were in existence on November 15, 1984.² This "freeze" was due, in part, to the Commission's concern over the level of interstate cost recovery by local exchange carriers ("LEC") from the Universal Service Fund ("USF"): "[t]he Commission took that action, in part, to ensure that LECs do not set up high cost exchanges within their existing service territories as separate study areas to

¹ See, e.g., In the Matter of Petition for Waivers Filed by Union Telephone Company, Inc. and U S WEST Communications, Inc. Concerning Section 61.41(c)(2) and 69.3(e)(11) and the Definition of "Study Area" Contained in the Part 36 Appendix-Glossary of the Commission's Rules, Memorandum Opinion and Order, 12 FCC Rcd. 1840 (1997); In the Matter of Petitions for Waivers Filed by Alpine Communications, L.C., Butler-Bremer Mutual Telephone Company, Clarksville Telephone Company, Dumont Telephone Company, Grand River Mutual Telephone Corporation, Heartland Corporation, South Central Communications, Inc., Universal Communications, Inc., and U S WEST Communications, Inc. Concerning Sections 61.41(c)(2), 69.3(e)(11), 69.3(i)(4), 69.605(c) and the Definition of "Study Area" Contained in the Part 36 Appendix-Glossary of the Commission's Rules, Memorandum Opinion and Order, 12 FCC Rcd. 2367 (1997).

² See 47 C.F.R. Part 36, Appendix--Glossary.

maximize high cost support.”³ At the same time, the Commission recognized that its rules were not aimed at discouraging “the acquisition of high cost exchanges or the expansion of service to cover high cost areas.”⁴ Indeed, the Commission’s Common Carrier Bureau (“Bureau”) has implemented this policy decision by holding that changes in study areas that “result from the purchase or sale of exchanges in arms-length transactions” “do not conflict” with the concerns prompting the study area freeze.⁵

The Commission has also established a three-prong test for deciding whether study area waivers should be granted. The Commission should approve such waiver requests if it determines:

[F]irst, that the change will not affect adversely the USF support program;

[S]econd, that the state commission having regulatory authority does not object to the change; and

³ In the Matter of U S WEST Communications, Inc. and Eagle Telecommunications, Inc. Joint Petition for Waiver of the Definition of “Study Area” Contained in Part 36, Appendix-Glossary of the Commission’s Rules and Eagle Telecommunications, Inc. Petition for Waiver of Section 61.41(c) of the Commission’s Rules, Memorandum Opinion and Order, 10 FCC Rcd. 1771, 1773 ¶ 10 (1995) (“Eagle Decision”), citing In the Matter of MTS and WATS Market Structure, Amendment of Part 67 of the Rules, and Establishment of a Joint Board, CC Docket Nos. 78-72 and 80-286, 50 Fed. Reg. 939 (Jan. 8, 1985).

⁴ In the Matter of MTS and WATS Market Structure, Amendment of Part 67 of the Commission’s Rules and Establishment of a Joint Board, CC Docket Nos. 78-72 and 80-286, 49 Fed. Reg. 48325, 48337 ¶ 65 (Dec. 12, 1984).

⁵ In the Matter of Contel of the West Petition for Waiver of Section 36.125(f), Sections 36.154(e)(1) and (2), and the Definition of “Study Area” contained in Part 36, Appendix-Glossary, of the Commission’s Rules, Oregon-Idaho Utilities, Inc., Petition for Waiver of the Definition of “Study Area” contained in Part 36, Appendix-Glossary, of the Commission’s Rules, Memorandum Opinion and Order, 5 FCC Rcd. 4570, 4571 ¶ 9 (1990) (emphasis added).

[F]inally, that the public interest supports grant of the waiver.⁶

As demonstrated herein, the primary concern prompting the “freeze” in study areas is not an issue in this transaction, and the Commission’s three-prong test will be satisfied. Accordingly, U S WEST and Citizens respectfully request that the Commission grant the study area waivers permitting: (1) U S WEST to remove these eight exchanges at issue from its North Dakota study area; and (2) the affiliation of these exchanges within Citizens’ newly established North Dakota study area.

A. The USF Impact Arising From This Transaction

Since carriers purchasing high cost exchanges can only receive the same level of support per line as the seller received prior to the sale, there can, by definition, be no USF impact in these transactions. Citizens will receive the same amount of support as U S WEST currently receives in these eight North Dakota exchanges, so this transaction is a non-event for purposes of the USF.⁷

B. Neither The North Dakota Nor The Minnesota State Commissions Object To The Proposed Change In Study Area Boundaries

On February 9, 2000, the North Dakota Public Service Commission (“North Dakota PSC”) issued a letter notifying the Commission that it recently approved the

⁶ See, Eagle Decision, 10 FCC Rcd. at 1772 ¶ 5 (footnotes omitted).

⁷ In the Matter of Federal-State Joint Board on Universal Service, Report and Order, 12 FCC Rcd. 8776, 8942-943 ¶ 308 (1997); aff’d, rev’d and remanded in part sub nom. Texas Office of Public Utility Counsel v. FCC, 183 F.3d 393 (5th Cir. 1999);

sale of these eight exchanges. In its letter the North Dakota PSC also stated that it "... has no objection to the removal of the named exchanges from U S WEST's study area and the addition of those exchanges to the appropriate study area(s) of the acquiring company."⁸

On February 11, 2000, the Minnesota Public Utilities Commission issued a letter stating, "[t]he Commission has no objection to the FCC granting study area waivers to [U S WEST] for the Pembina and Fairmount, North Dakota exchanges."⁹

C. The Public Interest Will Be Served By Grant Of
The "Study Area" Waiver Requested Herein

Citizens plans to invest approximately \$10 million in the North Dakota exchanges it is purchasing during the first three years of ownership. While some of this capital investment will be used to perform maintenance, the remainder will be used to upgrade the network to provide enhanced services. Citizens plans to provide broadband/digital subscriber line services in the future when there is sufficient demand to make it possible to provide these services at an affordable cost. The North Dakota PSC also found that Citizens has "... the technical, financial and

pets. for reh'g. and reh'g. en banc denied, Sep. 28, 1999, mandate issued Nov. 2, 1999.

⁸ See Exhibit 1, letter from North Dakota PSC to Katherine Schroder, Federal Communications Commission, dated Feb. 9, 2000.

⁹ See Exhibit 1, letter from Minnesota Public Utilities Commission, dated Feb. 11, 2000.

managerial fitness and ability to provide telecommunications services in the exchanges currently served by U S WEST Communications, Inc.”¹⁰

Citizens has provided a description of the to-be-acquired service areas, as well as its proposed operations and upgrades associated with the to-be-acquired exchanges.¹¹ Moreover, Citizens and U S WEST have fully provided the information associated with their respective portions of the transaction as recommended by the Bureau.¹²

In light of the above, U S WEST and Citizens believe that the public interest would be served by the granting of the study area waivers requested herein.

III. CONCLUSION

For the reasons stated herein, U S WEST and Citizens respectfully request that the Commission expeditiously review and approve this Petition. This Petition raises no new issues of law, is supported by Commission precedent, and the facts involved in this Petition clearly demonstrate that the public interest will be served by such an expeditious grant. U S WEST and Citizens respectfully submit that an expeditious grant of this Petition will serve the public interest by affording the resident and business customers of these rural exchanges the benefits of the planned transfers.

¹⁰ See Exhibit 1, State of North Dakota Public Service Commission, Order, Case No. PU-2173-99-589, dated Jan. 26, 2000.

¹¹ See Attachments A and B.

¹² See, Public Notice, Common Carrier Bureau Establishes Expedited Processing Procedures for Petitioners Seeking Part 36 Study Area Waivers, 10 FCC Rcd. 13228 (1995) (“Study Area Public Notice”). Citizens’ specific information is provided herein as Attachment B.

Respectfully submitted,

**CITIZENS TELECOMMUNICATIONS
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Its Attorney

Of Counsel,
Dan L. Poole

February 15, 2000

(1995) ("Study Area Public Notice"). Citizens' specific information is provided herein as Attachment B.

ATTACHMENT A

LIST OF THE NORTH DAKOTA EXCHANGES AND ACCESS LINES

Alexander	242
Fairmount	397
Gwinner	563
Lisbon	1,838
Pembina	717
Watford City	1,572
Williston	10,538
Wyndmere	<u>691</u>
Total	16,558

*Access lines as of December 1998

ATTACHMENT B

RESPONSE OF U S WEST COMMUNICATIONS, INC. ("U S WEST") AND CITIZENS TELECOMMUNICATIONS COMPANY OF NORTH DAKOTA ("CITIZENS") TO THE COMMON CARRIER BUREAU'S LIST OF INFORMATION TO ACCOMPANY STUDY AREA WAIVER REQUESTS

1. A copy of the order, or other certified document, that states that the state telecommunications regulatory authority does not object to the requested study area waiver.

Response:

See Exhibit 1.

2. A copy of any order adopted by, or plan imposed by, a state commission that obligates the selling and/or purchasing local exchange carrier ("LEC") to upgrade or extend existing service.

Response:

There is no applicable state commission order or plan that creates an obligation on U S WEST to upgrade or extend existing service.

Citizens has expressed an intent to upgrade service in the North Dakota exchanges it is purchasing from U S WEST. See Exhibit 1.

3. A statement by the purchaser of all planned upgrades to the facilities being acquired with estimates of the costs of those upgrades. That statement should include detailed descriptions of all planned upgrades and extensions of service, the costs of the planned upgrades and extensions of service, proposed timetables for any upgrades, proposed timetables for extension of service, and construction and investment plans.

Response:

Citizens plans to invest approximately \$10 million in the North Dakota exchanges it is purchasing during the first three years of ownership. While some of this capital investment will be used to perform maintenance, the remainder will be used to upgrade the network to provide enhanced services. Citizens plans to provide broadband/digital subscriber line services in the future when there is sufficient demand to make it possible to provide these services at an affordable cost.

4. The numerical effects of the proposed transaction on the Universal Service Fund ("USF"). To isolate those effects, estimates should be provided of the seller's and purchaser's USF draw (i.e., receipts from the USF administrator) as if the transferred exchanges (and, in the case of the seller, the remaining exchanges) were set up as a separate study area before and after the planned upgrades. Complete copies of all studies performed in estimating these effects should be included. The studies should be accompanied by an explanation of the extent to which the studies include, and exclude, the effects of any state orders, or buyer-planned upgrades and/or extensions of service.

Response:

U S WEST currently receives no USF in the Mountain States North Dakota study area and after the sale of the proposed exchange will receive no USF.

Citizens' estimated cost per loop, under the current methodology, would qualify this study area for \$775,453 of high cost support. Federal Communications Commission rules require that the USF High Cost fund impact will remain revenue neutral. Thus Citizens' USF draw will be zero dollars.

5. If the proposed transaction will increase the USF draw of either the seller or the purchaser, the extent to which local ratepayers will assume the costs of planned upgrades and the extent to which local ratepayers will assume the costs of planned extensions of service.

Response:

For the six month period following the Closing Date, Citizens will adopt and maintain intrastate tariffs similar in all material respects to U S WEST's intrastate tariffs in effect for the exchanges on the Closing Date.

6. All accounting entries, using actual dollar amounts, if known, and estimated dollar amounts if not known, that the seller and purchaser intend to use to record the transaction for accounting purposes.

Response:

Please refer to Appendix A for an illustration of the accounting entries both U S WEST and Citizens plan to use for the contemplated transaction.

7. The buyer's plan for disposition of amounts recorded in Account 32.2005, Telecommunications Plant Adjustment, related to the purchase.

Response:

Citizens does not intend to request permission to record amortization of amounts in Account 32.2005, Telecommunications Plant Adjustment to Account 6565, Amortization Expense - Other.

8. A schedule, prepared by the seller, of the plant being sold that includes: the gross book value, accumulated depreciation, and dates of installation of the plant that is subject to the transaction.

Response:

The age distribution of the plant by account is included in Appendix B.

9. The interstate separations factors applicable to the seller's remaining plant, and the interstate separation factors that will be applicable to the transferred plant when acquired by the purchaser.

Response:

For U S WEST, the 1998 interstate ratio of Dial Equipment Minutes for North Dakota prior to the sale is 16.87%; for the exchanges being sold to Citizens is 17.89%, and for the remaining North Dakota exchanges is 16.81%. The 1998 Subscriber Plant Factor is 0.25.

For Citizens, the 1998 interstate ratio of Dial Equipment Minutes for the North Dakota exchanges unweighted is 17.89%.

10. Pro-forma revenue requirement calculations (interstate, intrastate and total), pre-sale and post-sale, for both the buying and selling LECs.

Response:

U S WEST's accounting system does not track financial results on an exchange basis. These amounts are based on a current estimate of the book value of the assets and U S WEST cost estimates. Certain cost estimates are the result of allocations among the exchanges. Assets do not include additional investments, retirements, depreciation or adjustments which will be made in the period interim to the sale closing. These estimates do not represent complete costs which will be appropriately determined by the buyer. U S WEST's estimated 1998 Interstate Revenue Requirement for the exchanges being sold to Citizens is calculated as follows:

Total State Revenue Requirement Analysis is "pre-Sale"	Intrastate	Interstate	Combined
*Estimates based on 1998 Results			
Average Net Investment (Rate Base)	100,783,000	54,960,000	155,743,000
Return on Investment	11,519,497	6,183,000	17,702,497
Operating Expense	83,851,000	31,482,000	115,333,000
Total Taxes	3,983,421	2,253,385	6,236,806
Total Revenue Requirement	99,353,918	39,918,385	139,272,303

**Revenue Requirement Analysis of Rural
Exchanges to be Sold**
Based on 1998 Results

Average Net Investment (Rate Base)	7,652,167	3,548,194	11,200,361
Return on Investment	874,643	399,172	1,273,815
Operating Expense	6,566,413	2,531,161	9,097,573
Total Taxes	336,417	151,139	487,556
Total Revenue Requirement	7,777,473	3,081,472	10,858,944

**Total Sales Revenue Requirement
Analysis "Post Sale"**
Estimated 1998 "Post Sale" Results

Average Net Investment (Rate Base)	93,130,833	51,411,806	144,542,639
Return on Investment	10,644,854	5,783,828	16,428,682
Operating Expense	77,284,587	28,950,839	106,235,427
Total Taxes	3,647,004	2,102,245	5,749,250
Total Revenue Requirements	91,576,446	36,836,913	128,413,359

*North Dakota currently does not have rate of return regulation and the resulting revenue requirement calculation on Intrastate operations. Intrastate estimates provided are based on 1998 results and the last applicable Intrastate ROR of 11.43%.

**Citizens – North Dakota
FCC Filing
Revenue Requirement Summary**

<u>Description</u>	<u>Intrastate</u>	<u>Interstate</u>	<u>Combined</u>
<u>2000 Pre-Sale:</u>			
Average Net Investment (Rate Base)	0	0	0
Return on Investment	0	0	0
Operating Expense	0	0	0
Total Taxes	0	0	0
Total Revenue Requirement	0	0	0

Estimated Post Sale:*

Average Net Investment (Rate Base)	10,510,744	3,527,020	14,037,764
Return on Investment	1,135,160	396,790	1,531,950
Operating Expense	7,984,106	2,073,363	10,057,469
Total Taxes	763,098	266,741	1,029,839
Total Revenue Requirement	9,882,365	2,736,893	12,619,258

*Reflects estimate after first full year of operation.

11. The number of access lines: (i) presently provided in the seller's study area; (ii) presently provided by the purchaser in each study area in that state; and (iii) that will be transferred.

Response:

U S WEST has approximately 251,000 access lines in the State of North Dakota. Citizens does not have any lines in North Dakota. Approximately 17,000 access lines are being transferred to Citizens as a result of the proposed transaction.

12. A map on which each of the following areas has been clearly outlined: (i) the service areas of the exchanges being transferred; (ii) the pre-transfer study area boundaries of the seller; and (iii) the study area boundaries of all study areas that the purchaser (and/or its affiliates) own in the state in which the exchanges are to be transferred are located.

Response:

See Appendix C.

APPENDIX A

SUMMARY OF ACCOUNTING ENTRIES (000)

U S WEST (SELLER'S BOOKS):

Debit Cash (Account 1120)	\$34,088
Debit Accumulated Depreciation (Account 3100)	\$27,094
Credit Plant in Service (Account 2001)	\$41,248
Credit Gain (Account 7350)	\$19,935

These amounts are based on a current estimate of the book value of the assets. The entries are the cost of assets being sold at a point in time prior to the sale closing. As such they do not include additional investments, retirements, depreciation or adjustments which will be made in the period interim to the sale closing. Cash entries are based on the Agreement For Purchase And Sale of North Dakota dated June 16, 1999. These do not represent final cash or asset distributions within the buying group. Until final closing these entries are preliminary and based on U S WEST estimates only.

CITIZENS (BUYER'S BOOKS):

Debit Plant in Service (Account 2001)	\$41,248
Debit Telecommunications Plant Adjustment (Account 2005)	\$19,935
Credit Cash (Account 1120)	\$34,088
Credit Depreciation Reserve (Appropriate Plant Accounts)	\$27,094

The amounts above are based on the most current estimate of the sales price and net book value of the investment. The purchase agreement provides for numerous purchase price adjustments. The price at closing, therefore, may be higher or lower than our estimates listed above. The above entries deal only with the current cost of assets being sold and do not include additional investments which will be made by Citizens or U S WEST prior to the sale.

APPENDIX B

AGE DISTRIBUTION OF PLANT

ACCUMULATED DEPRECIATION AMOUNTS

Investment as of Dec. 31, 1998

**North Dakota
Net Book Value**

Account	Alexander	Fairmount	Gwinner	Lisbon	Pembina	Williston	Watford City	Wyndmere	Total
	ALXNND	FAMYND	GWNRRD	LSBRND	PMBNND	WLSND	WTCYND	WYNDND	
	Book Cost	Book Cost	Book Cost	Book Cost	Book Cost	Book Cost	Book Cost	Book Cost	
2111 Land	\$ 584	\$ 680	\$ 3,814	\$ 2,733	\$ 189	\$ 58,023	\$ 13,594	\$ 12,474	\$ 92,091
2112 Motor Vehicles	\$ -	\$ -	\$ -	\$ 24,147	\$ -	\$ 129,569	\$ -	\$ -	\$ 153,715
2113 Aircraft	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
2114 Special Purpose Vehicles	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
2115 Garage Work Equip.	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
2116 Other Work Equip.	\$ -	\$ -	\$ -	\$ 7,644	\$ -	\$ 141,237	\$ 13,355	\$ -	\$ 162,236
2121 Buildings	\$ 65,843	\$ 129,332	\$ 104,334	\$ 107,526	\$ 160,114	\$ 1,266,518	\$ 244,297	\$ 121,385	\$ 2,199,349
2122 Furniture	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
2122 Artworks	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
2123.1 Office Equipment	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
2123.2 Company Comm. Equip.	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 7,583	\$ -	\$ -	\$ 7,583
2124 General Purpose Comput.	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 24,766	\$ -	\$ -	\$ 24,766
2211 Analog Electronic Switchi	\$ 289,675	\$ -	\$ -	\$ -	\$ -	\$ 4,435,718	\$ 1,651	\$ -	\$ 4,727,044
2212 Digital Electronic Switchin	\$ 100	\$ 274,535	\$ 425,661	\$ 319,698	\$ 311,717	\$ 54,726	\$ 1,263,102	\$ 342,012	\$ 2,991,550
2215.1 Step By Step Switching	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
2215.2 Crossbar Switching Eq.	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
2220 Operator Systems	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
2231 Radio Systems	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 487,505	\$ -	\$ -	\$ 487,505
2232 Circuit DDS	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 30,112	\$ -	\$ -	\$ 30,112
2232 Circuit Digital	\$ 197,489	\$ 191,479	\$ 304,304	\$ 155,891	\$ 429,647	\$ 2,125,334	\$ 481,278	\$ 118,034	\$ 4,003,457
2232 Circuit Analog	\$ 80,906	\$ 56,137	\$ 84,965	\$ 104,852	\$ 52,328	\$ 738,757	\$ 95,766	\$ 73,085	\$ 1,286,795
2351 Pub. Tel. Terminal Equip.	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
2362 Other Terminal Equip.	\$ -	\$ -	\$ -	\$ 302	\$ -	\$ 142,026	\$ 22,698	\$ 53,973	\$ 218,999
2411 Poles	\$ 1,631	\$ 19,373	\$ 5,489	\$ 33,435	\$ 2,421	\$ 131,259	\$ 7,138	\$ 17,722	\$ 218,469
2421 Aerial Cable Metallic	\$ 865	\$ 62,717	\$ 19,485	\$ 131,825	\$ 9,905	\$ 345,465	\$ 28,129	\$ 37,791	\$ 636,182
2421 Aerial Cable Non Metallic	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
2422 Underground Cable Metal	\$ -	\$ -	\$ 2,523	\$ 11,528	\$ 84	\$ 2,019,423	\$ 16,807	\$ 32,456	\$ 2,082,821
2422 Underground Cable Non	\$ -	\$ 14,269	\$ 19,650	\$ 2,827	\$ 7,479	\$ 82,405	\$ 12,832	\$ 8,565	\$ 148,026
2423 Buried Cable Metallic	\$ 1,073,719	\$ 675,942	\$ 768,202	\$ 1,494,805	\$ 714,215	\$ 8,816,428	\$ 2,121,472	\$ 1,743,844	\$ 17,408,628
2423 Buried Cable Non Metallic	\$ 187,802	\$ 224,038	\$ 98,391	\$ 287,858	\$ 1,077,179	\$ 234,764	\$ 344,949	\$ 579,911	\$ 3,034,893
2424 Submarine Cable Metallic	\$ -	\$ 1,409	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 1,409
2424 Submarine Cable Non Me	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
2426 Intra Bldg Cable Metallic	\$ 1,178	\$ 1,373	\$ 39,281	\$ 29,038	\$ 11,876	\$ 153,069	\$ 9,499	\$ 4,227	\$ 249,541
2426 Intra Bldg Cable Non Met	\$ -	\$ 729	\$ 4,758	\$ -	\$ 2,637	\$ -	\$ -	\$ 486	\$ 8,610
2431 Aerial Wire	\$ -	\$ 20	\$ -	\$ 8,608	\$ -	\$ 216	\$ 348	\$ 40	\$ 9,232
2441 Conduit Systems	\$ 1,890	\$ 17,732	\$ 26,710	\$ 55,387	\$ 20,281	\$ 854,389	\$ 43,165	\$ 45,332	\$ 1,064,885
Total Book Cost	\$ 1,901,683	\$ 1,669,765	\$ 1,907,566	\$ 2,778,102	\$ 2,800,073	\$ 22,279,291	\$ 4,720,081	\$ 3,191,336	\$ 41,247,898

Prepared by Fixed Assets
9/17/99

Proprietary and Confidential

1 of 3

Investment as of Dec. 31, 1998

**North Dakota
Net Book Value**

Account	Alexander	Fairmount	Gwinner	Lisbon	Pembina	Williston	Watford City	Wyndmere	Total
	ALXNND	FAMTND	GWNRRND	LSBNND	PMBNND	WLSTND	WTCYND	WYNDNRD	
	JR Reserve	JR Reserve	JR Reserve	JR Reserve	JR Reserve	JR Reserve	JR Reserve	JR Reserve	
2111 Land	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
2112 Motor Vehicles	\$ -	\$ -	\$ -	\$ 9,863	\$ -	\$ 48,100	\$ -	\$ -	\$ 57,963
2113 Aircraft	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
2114 Special Purpose Vehicles	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
2115 Garage Work Equip.	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
2116 Other Work Equip.	\$ -	\$ -	\$ -	\$ 3,952	\$ -	\$ 70,505	\$ 5,035	\$ -	\$ 79,491
2121 Buildings	\$ 11,164	\$ 16,636	\$ 22,712	\$ 24,572	\$ 31,710	\$ 407,261	\$ 60,072	\$ 13,086	\$ 587,213
2122 Furniture	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
2122 Artworks	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
2123.1 Office Equipment	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
2123.2 Company Comm. Equip	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 7,583	\$ -	\$ -	\$ 7,583
2124 General Purpose Comput	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 14,371	\$ -	\$ -	\$ 14,371
2211 Analog Electronic Switchi	\$ 179,640	\$ -	\$ -	\$ -	\$ -	\$ 2,847,989	\$ 894	\$ -	\$ 3,028,522
2212 Digital Electronic Switchin	\$ 92	\$ 139,539	\$ 316,290	\$ 224,066	\$ 181,069	\$ 21,828	\$ 1,138,815	\$ 156,325	\$ 2,178,024
2215.1 Step By Step Switching	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
2215.2 Crossbar Switching Eq.	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
2220 Operator Systems	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
2231 Radio Systems	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 449,079	\$ -	\$ -	\$ 449,079
2232 Circuit DDS	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 10,245	\$ -	\$ -	\$ 10,245
2232 Circuit Digital	\$ 162,165	\$ 146,446	\$ 245,076	\$ 118,084	\$ 223,210	\$ 1,811,487	\$ 409,342	\$ 79,267	\$ 3,195,078
2232 Circuit Analog	\$ 60,599	\$ 33,743	\$ 63,254	\$ 69,991	\$ 30,711	\$ 547,996	\$ 68,009	\$ 37,192	\$ 911,497
2351 Pub. Tel. Terminal Equip.	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
2362 Other Terminal Equip.	\$ -	\$ -	\$ -	\$ 115	\$ -	\$ 124,008	\$ 16,276	\$ 38,997	\$ 179,396
2411 Poles	\$ 1,631	\$ 18,161	\$ 5,184	\$ 30,186	\$ 2,421	\$ 131,259	\$ 7,106	\$ 12,819	\$ 208,767
2421 Aerial Cable Metallic	\$ 865	\$ 32,899	\$ 9,389	\$ 99,126	\$ 3,238	\$ 317,061	\$ 25,829	\$ 26,674	\$ 515,080
2421 Aerial Cable Non Metallic	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
2422 Underground Cable Metal	\$ -	\$ -	\$ 1,703	\$ 6,851	\$ 79	\$ 1,838,081	\$ 14,826	\$ 10,249	\$ 1,871,790
2422 Underground Cable Non	\$ -	\$ 6,968	\$ 9,572	\$ 1,729	\$ 2,688	\$ 37,644	\$ 5,645	\$ 3,415	\$ 67,661
2423 Buried Cable Metallic	\$ 716,383	\$ 489,183	\$ 593,748	\$ 1,080,885	\$ 317,841	\$ 5,965,533	\$ 1,574,682	\$ 907,049	\$ 11,645,305
2423 Buried Cable Non Metallic	\$ 101,674	\$ 116,566	\$ 62,480	\$ 191,969	\$ 519,615	\$ 126,306	\$ 186,505	\$ 224,757	\$ 1,529,872
2424 Submarine Cable Metallic	\$ -	\$ 1,362	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 1,362
2424 Submarine Cable Non Me	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
2426 Intra Bldg Cable Metallic	\$ 293	\$ 565	\$ 33,594	\$ 24,323	\$ 5,786	\$ 136,574	\$ 8,077	\$ 4,005	\$ 213,217
2426 Intra Bldg Cable Non Met	\$ -	\$ 431	\$ 2,467	\$ -	\$ 1,142	\$ -	\$ -	\$ 287	\$ 4,327
2431 Aerial Wire	\$ -	\$ 19	\$ -	\$ 7,992	\$ -	\$ 200	\$ 323	\$ 37	\$ 8,571
2441 Conduit Systems	\$ 547	\$ 2,530	\$ 5,335	\$ 15,222	\$ 2,765	\$ 288,526	\$ 10,998	\$ 4,073	\$ 329,997
Total JR Reserve	\$ 1,235,054	\$ 1,005,047	\$ 1,370,804	\$ 1,908,929	\$ 1,322,275	\$ 15,201,636	\$ 3,532,433	\$ 1,518,234	\$ 27,094,412

Investment as of Dec. 31, 1998

**North Dakota
Net Book Value**

Account	Alexander	Fairmount	Gwinner	Lisbon	Pembina	Williston	Watford City	Wyndmere	Total
	ALXIND	FAMIND	GWININD	LSBIND	PMBIND	WLSIND	WTCYND	WYNDIND	
	JR Net Book	JR Net Book	JR Net Book	JR Net Book	JR Net Book	JR Net Book	JR Net Book	JR Net Book	
2111 Land	\$ 584	\$ 680	\$ 3,814	\$ 2,733	\$ 189	\$ 58,023	\$ 13,594	\$ 12,474	\$ 92,091
2112 Motor Vehicles	\$ -	\$ -	\$ -	\$ 14,284	\$ -	\$ 81,468	\$ -	\$ -	\$ 95,752
2113 Aircraft	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
2114 Special Purpose Vehicles	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
2115 Garage Work Equip.	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
2116 Other Work Equip.	\$ -	\$ -	\$ -	\$ 3,692	\$ -	\$ 70,732	\$ 8,321	\$ -	\$ 82,744
2121 Buildings	\$ 54,679	\$ 112,696	\$ 81,622	\$ 82,953	\$ 128,404	\$ 859,256	\$ 184,225	\$ 108,299	\$ 1,612,135
2122 Furniture	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
2122 Artworks	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
2123.1 Office Equipment	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
2123.2 Company Comm. Equip	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
2124 General Purpose Comput	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 10,395	\$ -	\$ -	\$ 10,395
2211 Analog Electronic Switchi	\$ 110,035	\$ -	\$ -	\$ -	\$ -	\$ 1,587,729	\$ 758	\$ -	\$ 1,698,521
2212 Digital Electronic Switchin	\$ 8	\$ 134,996	\$ 109,372	\$ 95,631	\$ 130,648	\$ 32,898	\$ 124,286	\$ 185,687	\$ 813,526
2215.1 Step By Step Switching	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
2215.2 Crossbar Switching Eq.	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
2220 Operator Systems	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
2231 Radio Systems	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 38,426	\$ -	\$ -	\$ 38,426
2232 Circuit DDS	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 19,868	\$ -	\$ -	\$ 19,868
2232 Circuit Digital	\$ 35,325	\$ 45,032	\$ 59,228	\$ 37,807	\$ 206,437	\$ 313,848	\$ 71,936	\$ 38,767	\$ 808,379
2232 Circuit Analog	\$ 20,306	\$ 22,393	\$ 21,711	\$ 34,861	\$ 21,617	\$ 190,761	\$ 27,757	\$ 35,893	\$ 375,298
2351 Pub. Tel. Terminal Equip.	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
2362 Other Terminal Equip.	\$ -	\$ -	\$ -	\$ 187	\$ -	\$ 18,018	\$ 6,422	\$ 14,976	\$ 39,603
2411 Poles	\$ -	\$ 1,213	\$ 305	\$ 3,250	\$ -	\$ -	\$ 32	\$ 4,903	\$ 9,702
2421 Aerial Cable Metallic	\$ -	\$ 29,819	\$ 10,096	\$ 32,700	\$ 6,666	\$ 28,404	\$ 2,300	\$ 11,117	\$ 121,102
2421 Aerial Cable Non Metallic	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
2422 Underground Cable Metal	\$ -	\$ -	\$ 820	\$ 4,676	\$ 5	\$ 181,342	\$ 1,981	\$ 22,207	\$ 211,031
2422 Underground Cable Non	\$ -	\$ 7,301	\$ 10,078	\$ 1,098	\$ 4,791	\$ 44,761	\$ 7,187	\$ 5,150	\$ 80,365
2423 Buried Cable Metallic	\$ 357,336	\$ 186,758	\$ 174,454	\$ 413,920	\$ 396,374	\$ 2,850,896	\$ 546,790	\$ 836,795	\$ 5,763,322
2423 Buried Cable Non Metallic	\$ 86,128	\$ 107,473	\$ 35,911	\$ 95,889	\$ 557,564	\$ 108,457	\$ 158,445	\$ 355,154	\$ 1,505,021
2424 Submarine Cable Metallic	\$ -	\$ 47	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 47
2424 Submarine Cable Non Me	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
2426 Intra Bldg Cable Metallic	\$ 886	\$ 807	\$ 5,687	\$ 4,714	\$ 6,090	\$ 16,495	\$ 1,422	\$ 222	\$ 36,324
2426 Intra Bldg Cable Non Met	\$ -	\$ 298	\$ 2,290	\$ -	\$ 1,495	\$ -	\$ -	\$ 199	\$ 4,283
2431 Aerial Wire	\$ -	\$ 1	\$ -	\$ 616	\$ -	\$ 15	\$ 25	\$ 3	\$ 661
2441 Conduit Systems	\$ 1,343	\$ 15,202	\$ 21,375	\$ 40,165	\$ 17,516	\$ 565,863	\$ 32,168	\$ 41,259	\$ 734,888
Total JR Net Book	\$ 666,629	\$ 664,718	\$ 536,762	\$ 869,174	\$ 1,477,798	\$ 7,077,655	\$ 1,187,648	\$ 1,673,103	\$ 14,153,486

COMPANY: U S WEST COMMUNICATIONS
 STATE: NORTH DAKOTA
 EXCHANGE: ALXNND
 BUYER: UNKNOWN
 VIEW: ALXNND.J98

SUMMARY NET BOOK COST
 AS OF DECEMBER 1998

LOCATION	ACCOUNT DESCRIPTION	FRC	AIC	YEAR	UNITS	ORIGINAL COST	JR	
							RESERVE	NET BOOK COST
F51209	2232 CIRCUIT ANALOG	457C		1973		\$372.34	\$292.20	\$80.14
F51209		457C		1974		\$111.16	\$87.05	\$24.11
F51209		457C		1975		\$5,820.34	\$4,547.94	\$1,272.40
F51209		457C		1978		\$9,519.08	\$7,420.14	\$2,098.94
F51209		457C		1977		\$2,423.60	\$1,884.09	\$539.51
F51209		457C		1978		\$324.26	\$251.30	\$72.96
F51209		457C		1979		\$4,583.45	\$3,539.74	\$1,043.71
F51209		457C		1980		\$1,572.88	\$1,209.66	\$363.02
F51209		457C		1981		\$91.32	\$69.91	\$21.41
F51209		457C		1982		\$17,999.10	\$13,705.08	\$4,294.02
F51209		457C		1983		\$35.15	\$26.59	\$8.56
F51209		457C		1985		\$24.96	\$18.70	\$6.26
TOTAL FRC: 457C						\$42,877.44	\$33,052.41	\$9,825.03
TOTAL ACCOUNT: 2232 CIRCUIT ANALOG						\$42,877.44	\$33,052.41	\$9,825.03
TOTAL LOCATION: F51209						\$42,877.44	\$33,052.41	\$9,825.03
F51210	2111 LAND	20C		1970		\$584.36	\$0.00	\$584.36
TOTAL FRC: 20C						\$584.36	\$0.00	\$584.36
TOTAL ACCOUNT: 2111 LAND						\$584.36	\$0.00	\$584.36
F51210	2121 BUILDINGS	210C		1969		\$6,208.47	\$2,865.35	\$3,343.12
F51210		210C		1983		\$2,878.43	\$805.16	\$2,073.27
F51210		210C		1993		\$51,953.73	\$7,437.47	\$44,516.26
F51210		210C		1997		\$4,802.72	\$56.34	\$4,746.38
TOTAL FRC: 210C						\$65,843.35	\$11,164.32	\$54,679.03
TOTAL ACCOUNT: 2121 BUILDINGS						\$65,843.35	\$11,164.32	\$54,679.03

COMPANY: U S WEST COMMUNICATIONS
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SUMMARY NET BOOK COST
AS OF DECEMBER 1998

LOCATION	ACCOUNT DESCRIPTION	FRC	AIC	YEAR	UNITS	ORIGINAL COST	JR	
							RESERVE	NET BOOK COST
F51210	2211 ANALOG SW EQUIP	77C		1975		\$4,206.59	\$2,816.15	\$1,390.44
F51210		77C		1978		\$578.82	\$383.78	\$195.04
F51210		77C		1981		\$2,767.43	\$1,811.63	\$955.80
F51210		77C		1983		\$178,779.54	\$115,713.97	\$63,065.57
F51210		77C		1984		\$38,350.05	\$24,652.00	\$13,698.05
F51210		77C		1987		\$15,552.45	\$9,721.88	\$5,830.57
F51210		77C		1990		\$27,158.17	\$16,174.68	\$10,983.49
F51210		77C		1991		\$195.13	\$113.33	\$81.80
F51210		77C		1992		\$1,234.00	\$693.25	\$540.75
F51210		77C		1993		\$91.47	\$49.07	\$42.40
F51210		77C		1994		\$492.18	\$246.55	\$245.63
F51210		77C		1995		\$15,985.88	\$7,155.05	\$8,830.83
F51210		77C		1997		\$482.86	\$86.77	\$396.09
F51210		77C		1998		\$3,800.00	\$21.71	\$3,778.29
TOTAL FRC: 77C						\$289,674.57	\$179,639.82	\$110,034.75
TOTAL ACCOUNT: 2211 ANALOG SW EQUIP						\$289,674.57	\$179,639.82	\$110,034.75
F51210	2212 DIGITAL SW EQUIP	377C		1986		\$100.00	\$92.28	\$7.72
TOTAL FRC: 377C						\$100.00	\$92.28	\$7.72
TOTAL ACCOUNT: 2212 DIGITAL SW EQUIP						\$100.00	\$92.28	\$7.72
F51210	2232 CIRCUIT DIGITAL	257C		1991		\$254.83	\$200.62	\$54.21
F51210		257C		1996		\$101.83	\$34.31	\$67.52
F51210		257C		1998		\$373.05	\$17.88	\$355.17
TOTAL FRC: 257C						\$729.71	\$252.81	\$476.90
F51210		357C		1980		\$1,243.69	\$1,198.39	\$45.30
F51210		357C		1981		\$234.37	\$224.00	\$10.37
F51210		357C		1982		\$15,980.61	\$15,131.36	\$849.25

COMPANY: U S WEST COMMUNICATIONS
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**SUMMARY NET BOOK COST
 AS OF DECEMBER 1998**

LOCATION	ACCOUNT DESCRIPTION	FRC	AIC	YEAR	UNITS	ORIGINAL COST	JR	
							RESERVE	NET BOOK COST
F51210		357C		1983		\$2,380.15	\$2,201.05	\$179.10
F51210		357C		1984		\$179.93	\$174.50	\$5.43
F51210		357C		1985		\$77.80	\$74.80	\$3.00
F51210		357C		1986		\$233.08	\$221.91	\$11.17
F51210		357C		1987		\$135.51	\$125.87	\$9.64
F51210		357C		1988		\$3,988.79	\$3,583.39	\$396.40
F51210		357C		1989		\$84.35	\$55.88	\$8.47
F51210		357C		1990		\$155,807.76	\$129,498.42	\$26,309.34
F51210		357C		1991		\$5,072.35	\$3,993.38	\$1,078.97
F51210		357C		1992		\$588.28	\$439.52	\$158.74
F51210		357C		1993		\$778.08	\$521.33	\$256.75
F51210		357C		1994		\$738.39	\$434.43	\$303.96
F51210		357C		1995		\$6,428.83	\$3,086.72	\$3,332.11
F51210		357C		1996		\$2,707.97	\$912.45	\$1,795.52
F51210		357C		1997		\$108.69	\$14.40	\$94.29
TOTAL FRC: 357C						\$196,759.61	\$161,911.77	\$34,847.84
TOTAL ACCOUNT: 2232 CIRCUIT DIGITAL						\$197,489.32	\$162,164.59	\$35,324.73
F51210	2232 CIRCUIT ANALOG	57C		1974		\$657.62	\$514.99	\$142.63
F51210		57C		1980		\$1,426.62	\$1,097.31	\$329.31
F51210		57C		1981		\$267.74	\$204.98	\$62.76
F51210		57C		1982		\$1,285.63	\$963.69	\$301.94
F51210		57C		1988		\$7,109.86	\$5,155.81	\$1,954.05
F51210		57C		1993		\$5,019.72	\$2,595.45	\$2,424.27
F51210		57C		1995		\$300.00	\$108.37	\$193.63
TOTAL FRC: 57C						\$16,047.19	\$10,838.61	\$5,408.58
F51210		457C		1969		\$374.95	\$297.91	\$77.04
F51210		457C		1970		\$74.75	\$59.37	\$15.38
F51210		457C		1971		\$904.64	\$713.96	\$190.68
F51210		457C		1972		\$1,852.80	\$1,457.43	\$395.37
F51210		457C		1973		\$2,938.40	\$2,305.98	\$632.42
F51210		457C		1974		\$1,689.71	\$1,323.23	\$366.48

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See Confidentiality Restrictions in Confidentiality Agreement and in Confidential Offering Memorandum

COMPANY: U S WEST COMMUNICATIONS
 STATE: NORTH DAKOTA
 EXCHANGE: ALXNND
 BUYER: UNKNOWN
 VIEW: ALXNND.J98

**SUMMARY NET BOOK COST
 AS OF DECEMBER 1998**

LOCATION	ACCOUNT DESCRIPTION	FRC	AIC	YEAR	UNITS	ORIGINAL COST	JR	
							RESERVE	NET BOOK COST
F51210		457C		1975		\$1,567.38	\$1,224.73	\$342.65
F51210		457C		1976		\$2,663.85	\$2,076.48	\$587.37
F51210		457C		1977		\$319.27	\$248.20	\$71.07
F51210		457C		1978		\$124.43	\$96.43	\$28.00
F51210		457C		1979		\$3,130.06	\$2,417.31	\$712.75
F51210		457C		1981		\$669.90	\$512.86	\$157.04
F51210		457C		1982		\$4,440.84	\$3,381.40	\$1,059.44
F51210		457C		1984		\$257.66	\$194.48	\$63.18
F51210		457C		1990		\$128.38	\$85.62	\$42.76
F51210		457C		1991		\$535.50	\$335.17	\$200.33
F51210		457C		1992		\$304.60	\$175.64	\$128.96
F51210		457C		1993		\$3.86	\$2.00	\$1.86
TOTAL FRC: 457C						\$21,980.98	\$16,908.19	\$5,072.79
TOTAL ACCOUNT: 2232 CIRCUIT ANALOG						\$38,028.17	\$27,546.80	\$10,481.37
F51210	2411 POLE LINES	1C	1120	1932	1	\$25.25	\$25.25	\$0.00
F51210		1C	1120	1946	3	\$75.75	\$75.75	\$0.00
F51210		1C	1120	1955	1	\$25.25	\$25.25	\$0.00
F51210		1C	1120	1961	1	\$25.25	\$25.25	\$0.00
POLE 016 TO 022 FT		TOTAL AIC: 1120			6	\$151.50	\$151.50	\$0.00
F51210		1C	1125	1946	1	\$45.53	\$45.53	\$0.00
F51210		1C	1125	1955	1	\$45.53	\$45.53	\$0.00
F51210		1C	1125	1967	1	\$45.53	\$45.53	\$0.00
POLE 025 FT		TOTAL AIC: 1125			3	\$136.59	\$136.59	\$0.00
F51210		1C	1130	1940	1	\$65.38	\$65.38	\$0.00
F51210		1C	1130	1955	1	\$65.38	\$65.38	\$0.00
F51210		1C	1130	1967	1	\$65.38	\$65.38	\$0.00
F51210		1C	1130	1985	1	\$802.08	\$802.08	\$0.00
POLE 030 FT		TOTAL AIC: 1130			4	\$998.22	\$998.22	\$0.00